UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC,

Defendants.

DAILY NEWS, LP; CHICAGO TRIBUNE COMPANY, LLC; ORLANDO SENTINEL COMMUNICATIONS COMPANY, LLC; SUN-SENTINEL COMPANY, LLC; SAN JOSE MERCURY-NEWS, LLC; DP MEDIA NETWORK, LLC; ORB PUBLISHING, LLC; AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195-SHS Civil Action No. 1:24-cv-03285-SHS

Hon. Sidney H. Stein

(Hon. Ona T. Wang)

[PROPOSED] ORDER GRANTING MOTION TO ADMIT COUNSEL PRO HAC VICE

The motion of Edward A. Bayley, for admission to practice *Pro Hac Vice* in the above captioned action is granted.

Applicant has declared that he is a member in good standing of the bar of the State of California; and that his contact information is as follows:

Edward A. Bayley Keker, Van Nest & Peters LLP 633 Battery Street San Francisco, CA 94111-1809 Telephone: 415-391-5400 Facsimile: 415-397-7188

Email: ebayley@keker.com

Applicant having requested admission *Pro Hac Vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Holdings, LLC in the aboveentitled action:

IT IS HEREBY ORDERED that Applicant is admitted to practice *Pro Hac Vice* in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. 25

Dated:	March 25, 2025			
_			Ong T Wang	

United States Magistrate Judge